

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,

Plaintiff,

v.

No. 4:23-cv-0860-P

SKIPLAGGED, INC.,

Defendant.

**ORDER**

Before the Court is Plaintiff's motion for withdrawal of its Letter of Request to the Ministry of Justice of Poland. ECF No. 96.

Having considered the motion and applicable law, the Court **GRANTS** the motion, and hereby issues the withdrawal to the Polish Ministry of Justice attached to this Order.

**SO ORDERED** on this **18th day of April 2024**.

A handwritten signature in black ink, reading "Mark T. Pittman", written in a cursive style.

Mark T. Pittman  
UNITED STATES DISTRICT JUDGE

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

AMERICAN AIRLINES, INC.,

Plaintiff,

v.

SKIPLAGGED, INC.,

Defendant.

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Civil Action No. 4:23-CV-00860-P

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WITHDRAWAL OF LETTERS OF REQUEST TO THE  
MINISTRY OF JUSTICE OF THE REPUBLIC OF POLAND  
(Regarding Case Ref. No. DWMPC-V.8092.24.2024 / File Nos. I Cps 14/24, I Cps 15/24)

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TO THE MINISTRY OF JUSTICE OF THE REPUBLIC OF POLAND:

The United States District Court for the Northern District of Texas presents its compliments to the Ministry of Justice of the Republic of Poland (the “Poland Ministry of Justice”), and respectfully seeks to withdraw its previous request for international judicial assistance to obtain sworn testimony from Sebastian Suchanowski and Pawel Wrzosek that was to be used as evidence in the above-captioned civil proceeding pending before this Court. This Court’s previous request is hereby being withdrawn because the Court has been informed that the testimony of such witnesses is no longer necessary in this case.

This Court previously issued two Letters of Request, dated February 13, 2024, pursuant to the *Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters*, seeking international judicial assistance from the Poland Ministry of Justice to obtain testimony upon oral examination from two individuals residing in Poland—Sebastian

Suchanowski and Pawel Wrzosek. The applicant for said Letters of Request was American Airlines, Inc. ("American Airlines"), the plaintiff in the above-captioned case.

Because the testimony of Mr. Suchanowski and Mr. Wrzosek is no longer necessary in the above-captioned case, this Court is no longer in need of the assistance previously requested from the Poland Ministry of Justice. Thus, to avoid any further imposition or burden on the judicial authorities of Poland and the witnesses, this Court hereby respectfully withdraws and requests to cancel/terminate its Letters of Request dated February 13, 2024. No further action is sought or required from the Polish authorities at this time in connection with this matter.

This request is made with the understanding that it will in no way require Mr. Suchanowski to commit any offense, or to undergo a broader form of inquiry than he would if the litigation were conducted in Poland. The requesting Court is satisfied that the evidence sought to be obtained through this request is relevant and necessary and cannot reasonably be obtained by other methods. Because this Court lacks authority or jurisdiction to compel Mr. Suchanowski's participation in discovery and, such participation being necessary for justice to be served in the above-captioned proceedings, this Court respectfully requests assistance from the Poland Ministry of Justice.

**1. SENDER**

Honorable Judge Mark T. Pittman  
United States District Court for the Northern District of Texas, Fort Worth Division  
501 West 10<sup>th</sup> Street, Room 401  
Fort Worth, TX 76102-3673  
United States of America

**2. CENTRAL AUTHORITY OF THE REQUESTED STATE**

Ministry of Justice (Ministerstwo Sprawiedliwości)  
Departament Współpracy Międzynarodowej i Praw Człowieka  
Al. Ujazdowskie 11  
00-950 Warsaw  
P.O. Box 33  
Poland  
[sekretariat.dwmpc@ms.gov.pl](mailto:sekretariat.dwmpc@ms.gov.pl)

+48 22 23 90 870

**3. SPECIFICATION OF THE DATE BY WHICH THE REQUESTING AUTHORITY REQUIRES RECEIPT OF THE RESPONSE TO THE WITHDRAWAL OF THE LETTER OF REQUEST**

A response is requested as soon as reasonably possible.

**4. IN CONFORMITY WITH ARTICLE 3 OF THE CONVENTION, THE UNDERSIGNED APPLICANT HAS THE HONOUR TO SUBMIT THE FOLLOWING REQUEST:**

***a. REQUESTING JUDICIAL AUTHORITY (Article 3(a))***

Honorable Judge Mark T. Pittman  
United States District Court for the Northern District of Texas, Fort Worth Division  
501 West 10<sup>th</sup> Street, Room 401  
Fort Worth, TX 76102-3673  
United States of America

***b. NAMES AND ADDRESSES OF THE PARTIES AND THEIR REPRESENTATIVES (Article 3(b))***

***i. Plaintiff:***

American Airlines, Inc.  
1 Skyview Drive  
Fort Worth, TX 76155

***Representatives:***

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2200 Ross Avenue, Suite 5200



Dallas, TX 75201  
Telephone: (214) 665-3600

**ii. Defendant:**

Skiplagged, Inc.  
41 E. 11<sup>th</sup> St., 9<sup>th</sup> Floor  
New York, NY 10003  
-or-  
525 W. 28<sup>th</sup> St., # 1158  
New York, NY 10001

***Representatives:***

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Telephone: (214) 265-3800

**5. REQUEST FOR NOTIFICATION OF THE WITHDRAWAL OF THE REQUEST AND IDENTITY AND ADDRESS OF ANY PERSON TO BE NOTIFIED (Article 7)**

Please notify the following person regarding the withdrawal of the Request:

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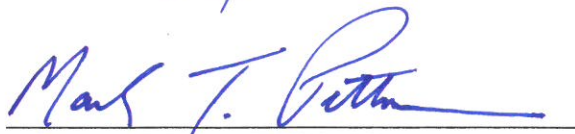
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**6. THE FEES AND COSTS INCURRED WHICH ARE REIMBURSABLE UNDER THE SECOND PARAGRAPH OF ARTICLE 14 OR UNDER ARTICLE 26 OF THE CONVENTION WILL BE BORNE BY:**

Plaintiff American Airlines, Inc.

DATE OF WITHDRAWAL OF REQUEST: 17 April, 2024



HON. MARK T. PITTMAN  
UNITED STATES DISTRICT JUDGE